Here are some facts and expectations to dispel some of the misinformation about the asphalt batch plant and concrete plant at the Tutvedt 2 site:

GROUNDWATER CONCERNS

- Currently approved crushing operations and diesel storage occur at least 23 feet above the shallow aquifer.
- Asphalt oil is only in a flowable liquid state when it is heated and being mixed with aggregate, is inert and is easier to contain than diesel fuel, which is already approved for storage at the site.
- A Spill Control and Countermeasures Plan is already in place and is required by DEQ and EPA.
- Above Ground Storage Tanks are located within a lined containment cell that will be capable of retaining the volume of oil or fuel stored in the tank should a spill occur.
- A Groundwater Characterization Report was completed for the site back in 2008, and the report determined that operations would not have an adverse impact on water quality or quantity.
- Best Management Practices outlined by MDT's Erosion and Sediment Control Best Management
 Practices Manual will be used to protect surface and groundwater from potential contamination
 by materials associated with operation of an asphalt and concrete batch plant.

SCREENING AND VEGETATION

- The pit floor where the asphalt plant would be located is approximately 35 feet below ground surface. The highest point of the asphalt plant is approximately 40 feet. This would effectively shield the plant from view from most surrounding properties as most of the plant is below 35 feet in elevation.
- Our portable asphalt plants are drum mix plants, not batch plants. Batch Plants are much larger and have large silos that stick way up in the air and store asphalt in batches. Our plant stores a small amount in a load out silo, which is much smaller, and is continually emptied by trucks when running.
- Our portable asphalt plants and concrete plants have a similar "footprint" to our crushers, which have been operating at the pit every 1-2 years over the last 10 years.
- Topsoil berms of at least 8 feet in height along Farm to Market Rd. help shield the view of the pit operations. These berms have been seeded and have grass growing on them.
- The landowner has planted trees along some of the berms. This is outside the requirements of the CUP but was done to demonstrate good will to neighbors.

FIRE FIGHTING AND SPILL PREVENTION

• Asphalt Cement is <u>not flammable or combustible</u> by OSHA and Workplace Hazardous Materials Information System criteria.

The West Valley Fire Department was contacted regarding the addition of the asphalt plant. In
the unlikely event of a fire involving the asphalt oil tank, the West Valley Fire Department has
the capability to handle any fire involving the asphalt plant. Heavy equipment is available onsite
to assist firefighting operations if needed.

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- A Spill Prevention Control & Countermeasures Plan is in place to contain and handle any spills that may occur and has been reviewed by the West Valley Fire Department.
- Asphalt oil is easier to contain and control than diesel fuel in the case of a spill because it hardens as it cools. Diesel fuel storage is already approved at the site.

TRAFFIC

- The hours of operation at the site are limited to 7am to 7pm, Monday through Friday and 7am to 2pm on Saturday. These reduced hours will limit the amount of traffic in and out of the pit.
- Asphalt plants don't usually operate during December, January, February and March of each year due to weather limitations.
- A Traffic Impact Study was completed in 2008 and it was determined that the operation of the gravel pit would have no impact on traffic conditions.
- It is estimated that current demand for asphalt would be 56,000 tons over the next 5 years. This would only increase the average trips per day in and out of the pit by 5.3 trips per day.
- It is estimated that the possibility of one large project may occur every 5 years. Based on a quantity of 20,000 tons of asphalt, this would only increase the trips per day at the pit by 2 trips over a 5-year period. Most large projects are completed in a 10-day period, depending on weather conditions.
- Farm to Market Road is a secondary highway (S-424) and is capable of handling heavy truck traffic.
- Having the asphalt plant located closer to the source will reduce truck traffic in the area by eliminating the need to truck it in from another location using more trucks.
- There is no immediate need to use a concrete batch plant at the pit. If a concrete batch plant were moved to the site, it is estimated that 218,000 yards of concrete could be produced over 5 years. This would increase pit traffic by 30 trips per day.

NOISE

- The asphalt plant and concrete batch plant produce less noise and vibration than the crushing plants that are currently approved for use at the site.
- Earthen berms are constructed and serve as a sound barrier.
- Mufflers are used on all generators.
- The current hours of operation limit the noise exposure to surrounding properties.
- Noise and vibration will be greatly reduced by the positioning of the plant on the pit floor.
- Asphalt plant is used occasionally, not constantly.

AIR QUALITY/FUMES

- Emissions from the asphalt plant and concrete plant include particulate matter, carbon monoxide and nitric oxide.
- These emissions are closely monitored by the EPA and Montana DEQ to make sure they are maintained below certain operating and emitting thresholds.

- Our asphalt and concrete batch plants are registered with DEQ to ensure compliance with air quality standards.
- Baghouse filters are used to control particulate emissions and are required to meet specific
 performance standards outline by the EPA and DEQ. Frequent watering of roads is performed
 to reduce dust while plants are in operation.
- Most of our operators have had opacity training to ensure our plants do not exceed the opacity threshold set by DEQ.
- Fumes may be noticeable from neighboring properties when the asphalt plant is running. The chances of these fumes being noticed is greatly reduced by the limited hours of operation, occasional use at the pit and by the positioning of the plant on the pit floor away from the property boundary edges.
- Dust is further reduced by the paved approach into the site.